



# The WALT DISNEY Company

Susan L. Fox  
Vice President  
Government Relations

September 27, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TWB204  
Washington, D.C. 20554

Re: Ex Parte Presentations in MM Docket No. 00-167

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, this letter serves as notice that on September 26, 2005, Preston Padden and Susan Fox, The Walt Disney Company; Anne Lucey and DeDe Lea, Viacom; and Seth Waxman, Wilmer Cutler Pickering Hale and Orr, LLP, representing The Walt Disney Company; met with Commissioner Michael J. Copps and Jordan Goldstein, Senior Legal Advisor to Commissioner Copps.

The captioned proceeding is not restricted and therefore oral presentations are permitted, but must be disclosed. The presentation discussed the issues resulting from the continued pendency of petitions for reconsideration, including timing issues related to broadcast and cable operations and possible court review in connection with the rules adopted in the Commission's November 23, 2004 Order. The attached document was described briefly as reflecting industry discussions regarding alternatives to the website rules.

If you have any questions concerning these presentations, please contact the undersigned.

Respectfully submitted,



Susan L. Fox

cc: Commissioner Michael J. Copps  
Jordan Goldstein, Senior Legal Advisor to Commissioner Copps

# The Landing Page

1. The page to which the viewer is directed will be ad/commercial-link free.
2. The URL of the landing page will not be fixed.
3. The landing page will contain relevant and substantial TV programming-related content.

# The Buffer Page

4. The next click off the landing page will be mediated by a buffer page with no ad/commercial links contained within it.

This buffer page will serve to notify users that they will be entering a portion of the site that may contain commercial matter.

Users will have to opt-in to proceed further, e.g.: "Click OK if you wish to proceed."

# Ad Separation

5. Commercial matter (e.g., advertisements, sponsorships) on these websites will be clearly separated and labeled so that children can distinguish commercial messages from non-commercial content.

Due to the evolving nature of new media technology, the websites will determine the appropriate method for such separation and identification (e.g., ad slugs, bumpers, borders, sponsor identification)

6. All rich media ad units will carry a visible and functional close button or some other user-initiated close functionality for the entire duration of the display that is both easy to use and clearly understandable for children.

## 3rd-Party Website Notification

7. Upon a user clicking on a third-party advertisement or link from Company's website that may contain commercial matter, Company shall display a notification message alerting users that they are leaving the Company's website.

# Audience Awareness

8. All relevant websites will carry a link or links to a part of their site which lists the foregoing measures and explains their intent to interested audience members as an industry-wide audience information initiative